

EXHIBIT B

WILMERHALE

Via ECF & Federal Express

Robert J. Gunther, Jr.

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+1 212 230 8830(t)
+1 212 230 8888(f)
robert.gunther@wilmerhale.com

The Honorable F. Dennis Saylor, IV
United States District Judge
United States District Court
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Re: *Abbott GmbH & Co., KG et al. v. Centocor Ortho Biotech, Inc., et al.*, C.A. No. 4:09-cv-11340

Dear Judge Saylor:

This letter is submitted jointly on behalf of the parties in the above-captioned matter to propose a short jury questionnaire for the Court's consideration.

The parties understand the Court has used questionnaires in limited situations and that the Court is interested in efficiently impaneling the jury. With these goals in mind, subject to the Court's approval, the parties have agreed to the enclosed proposed jury questionnaire (*see* Attachment A).

We believe that this one-page questionnaire should be easy to read and complete. The proposed questions are largely intended to identify any potential cause challenges and biases with respect to the parties or products.

We will be prepared to discuss this with the Court during the August 13 status conference.

Respectfully submitted,



Robert J. Gunther, Jr.

Enclosure

cc: Dianne B. Elderkin (via email)
Barbara L. Mullin (via email)

ATTACHMENT A

JUROR QUESTIONNAIRE

Juror No. _____

1. Name: _____ Age: _____ ☐ Male ☐ Female
2. County in which you live, and how long you have lived there? _____
3. What is the last or highest level of school you completed (if beyond high school, indicate field of study)? _____

4. If employed, what is your current occupation, place of work, and time of employment? _____

5. Do you supervise other people at your job? ☐ Yes ☐ No
6. If you are not presently employed or if you have held significant other employment during the past 10 years, then please describe these jobs. _____

7. What is your current marital status, if married for how long? _____
8. Please describe spouse or partner's occupation/employment: _____
9. Have you or your significant other ever owned your own business? ☐ Yes ☐ No
10. Are you or someone in your immediate family a union member? ☐ Yes ☐ No If yes, what union? _____
11. Have you or your significant other ever served in the military or law enforcement? ☐ Yes ☐ No
12. Have you or someone close to you ever taken any courses, had training, or been employed in any of the follow industries or fields? [Check all that apply] ☐ Law ☐ Accounting/Finance ☐ Pharmaceutical industry
☐ Biology/Chemistry ☐ Biomedicine ☐ Medicine/Healthcare ☐ Research and Development
If yes, please describe: _____
13. Have you, or someone close to you, ever been a witness in court, filed a lawsuit, or been sued? ☐ Yes ☐ No
If yes to any of the above, please explain. _____
14. Have you ever served on a jury? ☐ Yes ☐ No If yes, were you the foreperson? ☐ Yes ☐ No
If yes, was it civil or criminal and what was the outcome? _____
15. Have you or someone close to you been diagnosed with psoriasis? ☐ Yes ☐ No
If yes, who? _____ What medications, if any does this person take? _____
16. Have you or someone in your household ever purchased products form any of the following companies?
Abbott Laboratories ☐ Yes ☐ No Johnson & Johnson (J&J) ☐ Yes ☐ No
Centocor Ortho Biotech ☐ Yes ☐ No
If yes, please describe what products and whether you were satisfied with those products: _____
17. Have you or someone close to you ever taken any of the following products? [Check all that apply]
☐ Enbrel ☐ Humira ☐ Stelara ☐ Remicade ☐ Amevive ☐ Simponi
18. Have you or someone close to you ever invented anything OR had any significant experience with patents, such as developing an invention to be patented, applying for a patent, or working with patents at a job? ☐ Yes ☐ No
If "yes," please explain: _____
19. Do you have any beliefs about patents, the patent system, or the enforcement of patents that might interfere with or affect your ability to serve as a fair and impartial juror in this case? ☐ Yes ☐ No
If "yes," please explain: _____